

As General Manager of the Michigan Net, QMN, I am writing to express our organization's opinion regarding the proposed creation of an additional Amateur Radio allocation at 5.25 mHz.

As an organization of radio amateurs dedicated to providing emergency and disaster telecommunications services to a wide variety of local, state, and Federal agencies, we feel this allocation would provide significant benefits to those radio amateurs engaged in public service communications activities.

Experience has indicated the need for an allocation between 3.5 and 7 mHz suitable for supporting state and region-wide communications during public service and emergency communications activities. In addition, we have found our organization's network activities occasionally displaced from our 7 mHz alternate frequencies by Canadian SSB transmissions, many of which now occupy bandwidths in excess of 5 kHz due to poor transmitter adjustment and excessive audio processing.

Whereas the proposed 5.25 mHz allocation would be a valuable tool, we feel it is extremely important that the Commission reserve a significant portion of this allocation for narrow-bandwidth modes such as radiotelegraphy, PACTOR, and similar digital techniques. Our experience with the 7 mHz band has indicated that the wide bandwidth consumed by SSB transmissions is quite incompatible with narrow-bandwidth digital modes.

In light of the future potential of narrow-bandwidth digital technologies in the Amateur Radio Service, it seems wise to insure that a portion of the Amateur Radio spectrum remain available for these methods in addition to radiotelegraphy. This will not only assist organizations such as ours, but encourage the implementation of new technology within the Amateur Radio Service.

If the Commission must allocate a portion of this new band to voice (SSB) technology, we recommend that transmitter power be limited to not more than 250 watts, except as necessary to provide emergency communications. This would insure that those networks utilizing SSB would be able to maintain some control of the frequency during disaster situations.

In summary, we recommend the following actions be taken:

- 1) The 5.25 mHz allocation be assigned to the Amateur Radio Service as proposed.
- 2) 5.250 to 5.325 mHz be allocated to radiotelegraphy and other narrow-bandwidth modes.
- 3) 5.325 to 5.40 mHz be allocated to SSB communications with PEP not to exceed 250 watts except as required in time of emergency.

Thank you for your time and consideration. If you wish to contact us, please feel free to contact me at 616-673-8845 or via e-mail at "wb8siw@arrl.net."

Thank you,

James Wades,  
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